

1 COUGHLIN STOIA GELLER  
2 RUDMAN & ROBBINS LLP  
3 AZRA Z. MEHDI (220406)  
4 WILLOW E. RADCLIFFE (200087)  
5 DANIEL J. PFEFFERBAUM (248631)  
6 SUZANNE H. KAPLAN (247067)  
7 JAMES G. GILYARD (220791)  
8 100 Pine Street, Suite 2600  
9 San Francisco, CA 94111  
10 Telephone: 415/288-4545  
11 415/288-4534 (fax)  
12 amehdi@csgrr.com  
13 wradcliffe@csgrr.com  
14 dpfefferbaum@csgrr.com  
15 shkaplan@csgrr.com  
16 jgilyard@csgrr.com  
17 – and –  
18 EX KANO S. SAMS II (192936)  
19 9601 Wilshire Blvd., Suite 510  
20 Los Angeles, CA 90210  
21 Telephone: 310/859-3100  
22 310/278-2148 (fax)  
esams@csgrr.com

13 Attorneys for Plaintiff

14 [Additional counsel appear on signature page.]

15 ALTSHULER BERZON LLP  
16 MICHAEL RUBIN (80618)  
17 177 Post Street, Suite 300  
18 San Francisco, CA 94108  
19 Telephone: 415/421-7151  
20 415/362-8064 (fax)  
21 mrubin@altshulerberzon.com

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA

17 DONALD NOBLES, Individually and on ) No. C-06-03723-CRB(JL)  
18 Behalf of All Others Similarly Situated, )  
19 ) CLASS ACTION  
20 Plaintiff, )  
21 vs. )  
22 MBNA CORPORATION, et al., )  
23 Defendants. )  
24  
25  
26  
27  
28

---

1 WHEREAS, by Order of May 16, 2008, the Court had previously vacated all pretrial  
2 deadlines due to a settlement in principle reached by the parties;

3 WHEREAS, the parties are working in good faith to complete the confirmatory process and  
4 to document the proposed settlement for submission to the Court for its review;

5 WHEREAS, the parties have not yet completed the confirmatory process, but have agreed to  
6 use reasonable best efforts to do so and, to that end, are in the process of scheduling a follow-up  
7 mediation session with the Honorable William J. Cahill (Ret.) to assist them in completing that  
8 process;

9 WHEREAS, the parties agree that it will serve judicial efficiency and that the parties will be  
10 in a better position to inform the Court of the status of the proposed settlement if the currently  
11 scheduled Case Management Conference for August 22, 2008 is vacated and rescheduled for  
12 September 19, 2008, or the Court's earliest available date thereafter; and

13 || WHEREAS, no trial date is currently scheduled in this action.

14 NOW THEREFORE, the parties, by and through their counsel, stipulate and request that the  
15 Court vacate the currently scheduled Case Management Conference for August 22, 2008 and  
16 reschedule it for September 19, 2008, or the Court's earliest available date thereafter.

17 || IT IS SO STIPULATED.

18 || DATED: August 12, 2008

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
AZRA Z. MEHDI  
WILLOW E. RADCLIFFE  
DANIEL J. PFEFFERBAUM  
SUZANNE H. KAPLAN  
JAMES G. GILYARD

/s/ Azra Z. Mehdi  
**AZRA Z. MEHDI**

100 Pine Street, Suite 2600  
San Francisco, CA 94111  
Telephone: 415/288-4545  
415/288-4534 (fax)

1 COUGHLIN STOIA GELLER  
2 RUDMAN & ROBBINS LLP  
3 EX KANO S. SAMS II  
4 9601 Wilshire Blvd., Suite 510  
5 Los Angeles, CA 90210  
6 Telephone: 310/859-3100  
7 310/278-2148 (fax)

8 COUGHLIN STOIA GELLER  
9 RUDMAN & ROBBINS LLP  
10 PATRICK J. COUGHLIN  
11 BONNY E. SWEENEY  
12 655 West Broadway, Suite 1900  
13 San Diego, CA 92101  
14 Telephone: 619/231-1058  
15 619/231-7423 (fax)

16 ALTSHULER BERZON LLP  
17 MICHAEL RUBIN  
18 177 Post Street, Suite 300  
19 San Francisco, CA 94108  
20 Telephone: 415/421-7151  
21 415/362-8064 (fax)

22 Attorneys for Plaintiff

23 DATED: August 12, 2008

24 ARNOLD & PORTER LLP  
25 LAURENCE J. HUTT  
26 JOHN R. LAWLESS  
27 TERI R. RICHARDSON

28 \_\_\_\_\_  
18 /s/ Laurence J. Hutt  
19 LAURENCE J. HUTT

20 777 South Figueroa Street, 44th Floor  
21 Los Angeles, CA 90017  
22 Telephone: 213/243-4000  
23 213/243-4199 (fax)

24 ARNOLD & PORTER LLP  
25 SHARON DOUGLASS MAYO  
26 90 New Montgomery Street, Suite 600  
27 San Francisco, CA 94105  
28 Telephone: 415/356-3000  
415/356-3099 (fax)

29 Attorneys for Defendants

1 I, Azra Z. Mehdi, am the ECF User whose ID and password are being used to file this  
2 Stipulation and [Proposed] Order re: Extending Date for Case Management Conference. In  
3 compliance with General Order No. 45, X.B., I hereby attest that Laurence J. Hutt has concurred in  
4 this filing.

5 \_\_\_\_\_/s/ Azra Z. Mehdi  
6 AZRA Z. MEHDI  
7 \* \* \*

8 **O R D E R**

9 PURSUANT TO STIPULATION, IT IS SO ORDERED.

10 DATED: August 12, 2008

11 T:\CasesSF\MBNA Live Check\STP00053275.doc

